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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Administration of the)

North American Numbering Plan)

CC Docket No. 92-237

**APPLICATION OF MFS COMMUNICATIONS COMPANY, INC.
FOR MEMBERSHIP ON THE
NORTH AMERICAN NUMBERING COUNCIL**

Pursuant to FCC Public Notice, DA 95-1721, released August 9, 1995, MFS Communications Company, Inc. ("MFS") by its undersigned counsel hereby submits its application and nomination for membership to the North American Numbering Council ("NANC" or "Council").

**I. MFS IS COMMITTED TO THE CONTINUED DEVELOPMENT OF
COMPETITION IN TELECOMMUNICATIONS.**

MFS is the largest competitive access provider in the United States and is currently authorized to provide competitive local exchange service in eight states. As such, the rights, interests and competitive position of MFS and its subsidiaries will be directly affected by the administration of the North American numbering plan. MFS has been a proponent of pro-competitive telecommunications policy and, as such, seeks to obtain membership on the North American Numbering Council to ensure that numbering administration is implemented on a fair, equitable and pro-competitive manner.

MFS' experience in seeking to obtain NXX codes as a competitive local exchange carrier in several jurisdictions and its participation in a number of proceedings relating to address area code number exhaust allows it to offer a unique perspective on North American Numbering Plan

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administration. MFS offers local exchange service in more states than any other competitive local exchange carrier. Hence, MFS will be able to offer the Council its experiences in a variety of state regulatory environments which will assist in the development of a more effective integrated approach to numbering in North America.

As recognized in both pending federal telecommunications reform bills S.652 and H.R. 1555, numbering issues, including local number portability, are critical issues in the development of local competition. As the Commission stated in its Notice in CC Docket No. 95-116 "[W]e tentatively conclude that the portability of telephone numbers benefits the consumers of telecommunications services and would contribute to the development of competition among alternative providers of local telephone and other telecommunications services."¹

As the local competitor that has led regulatory and legislative changes at the national and state levels, MFS is uniquely qualified to represent local competitive interests on the Council. Moreover, MFS is not affiliated with the interexchange carrier industry or the cable television industry. In addition, MFS is committed to actively participate in good faith in the objectives of the Council.

II. MFS' NOMINATION FOR COUNCIL MEMBERSHIP

MFS nominates Suzanne L. Yerdon for Council membership. Ms. Yerdon is the Director of Industry Affairs and Business Policy for MFS Intelenet, Inc., a subsidiary of MFS. Ms. Yerdon is highly qualified to represent the interests of MFS and its subsidiaries and brings with her nearly a decade of experience in numbering, access services and network interconnections.

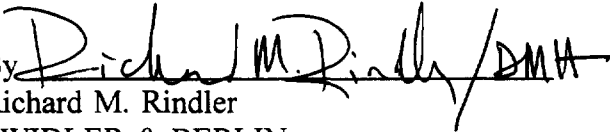
¹ Notice of Proposed Rulemaking, CC Docket No. 95-116, released July 13, 1995, at ¶ 7.

Her qualifications are detailed in Attachment A. Ms. Yerdon may be contacted as follows:

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Respectfully submitted,

By /DMH

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September 14, 1995

Counsel for MFS Communications Company, Inc.

ATTACHMENT A

Suzanne L. Yerdon
Director, Industry Affairs and Business Policy
MFS Intelnet, Inc.

Suzanne Yerdon joined MFS Intelnet in June, 1994 and represents MFSI before the industry on interconnection issues and numbering issues. At MFSI, she has responsibility for the development of policy and standards pertaining to network interconnections between MFSI and incumbent LECs, ordering and billing policies and number administration. Before MFS Intelnet, she worked for Bellcore for two years in its access services marketing and public policy group. In her experience with Bellcore, she assisted Bell Operating Companies in responding to market demands for access services through development of implementation plans for FCC Orders requiring the unbundling of access services. She also worked with client companies on the four year assessment of Price Cap Regulation.

Before joining Bellcore, Suzanne spent almost six years with Pacific Bell in San Francisco, CA. At Pacific Bell, she worked on state and federal strategies for Switched Access services including financial, marketing and public policy analyses. In that capacity, she developed testimony for the Implementation Rate Design (IRD), a rate case before the California Public Utilities Commission, and developed rates and documentation for the first Price Cap filing presented to the FCC. She also was a Centrex product manager and managed a new services forecasting group while at Pacific Bell.

Suzanne attended Colby College, Waterville ME, receiving a BA degree in Business Administration; and graduated from Fairleigh Dickinson University with an MBA in Marketing.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September 1995 copies of the foregoing APPLICATION OF MFS COMMUNICATIONS COMPANY, INC. FOR MEMBERSHIP ON THE NORTH AMERICAN NUMBERING COUNCIL were sent via Hand-Delivery to the parties on the attached service list.



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